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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.
DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF LILIANA CAETANO
BACHELDER**

1 **DECLARATION OF LILIANA CAETANO BACHELDER**

2 I, Liliana Caetano Bachelder, declare as follows:

3 1. I am over 18 years of age and competent to give this declaration. This declaration is
4 based on my personal knowledge, information, and belief.

5 2. I am an International Trade Specialist for the U.S. Department of Agriculture's
6 ("USDA") Foreign Agricultural Service in the Foreign Affairs Program Area. The Foreign
7 Agricultural Service ("FAS") is the foreign affairs and trade arm of the USDA whose primary
8 mission is to open trade in other countries and assist farmers and producers in the United States to
9 export their agricultural products abroad.

10 3. I have worked at FAS for 31 years. In my role, I work to support U.S. agricultural
11 exports and advance U.S. foreign policy by providing market intelligence, trade analysis, and
12 advocacy for U.S. producers abroad.

13 4. I am the president of the Foreign Agricultural Service Employees, Local 3976,
14 District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO
15 ("AFSCME Local 3976" or the "Union"). I have served as president of AFSCME Local 3976 for
16 4 years.

17 5. AFSCME Local 3976 is affiliated with AFSCME District Council 20 and
18 AFSCME International Union. District Council 20, through its constituent local unions like Local
19 3976, represents federal civilian employees in agencies and departments across the federal
20 government.

21 6. Local 3976 represents a bargaining unit of approximately 400 civil servants who
22 work for the Foreign Agricultural Service in the Washington, D.C. metropolitan area. These
23 employees include International Economists, International Trade Specialists, Nutritionists, Trade
24 Policy Analysts, International Science Advisors, Technical Assistance Specialists, International
25 Market Specialists, and others. These bargaining unit members work closely with other federal
26 agencies, American producer and farmer associations, the World Trade Organization, and foreign
27 governments to facilitate American agricultural exports.

1 7. AFSCME Local 3976's mission is to advocate for and promote the interests of
 2 bargaining unit members in their federal employment. As the exclusive bargaining representative
 3 of these workers, the Union provides many services to all bargaining unit members. Core
 4 functions of the Union include collective bargaining with the USDA to obtain a fair and
 5 reasonable collective bargaining agreement ("CBA"); filing and negotiating grievances against the
 6 agency to enforce the terms and conditions of the CBA; pursuing arbitrations on behalf of workers
 7 to enforce the CBA; and providing other support, guidance, and resources to bargaining unit
 8 employees.

9 8. The Union first became aware of President Trump's plan to conduct "large-scale"
 10 RIFs through the February 11, 2025, Executive Order, "Implementing the President's Department
 11 of Government Efficiency Workforce Optimization Initiative." No one from the USDA had said
 12 anything about large-scale RIFs to the Union or to me personally prior to that Order.

13 9. Beginning in January 2025, employees of FAS began to receive termination notices
 14 and other pressure from the USDA to leave their jobs. First, on January 28, 2025, employees were
 15 offered the Deferred Resignation Program ("DRP") via government-wide email with short
 16 deadlines and confusing language. Then, on February 13, 2025, probationary employees at the
 17 FAS began receiving emails from the USDA terminating their employment. These terminated
 18 probationary employees were later offered reinstatement to their jobs as a result of various legal
 19 actions, and most but not all returned. On April 17, 2025, the USDA offered a second round of
 20 the Deferred Resignation Program to eligible employees, again with tight deadlines, encouraging
 21 employees to leave service. I estimate that between January and April 2025, approximately 150—
 22 about 21%—of employees left the FAS.

23 10. The communication regarding the April 2025 Deferred Resignation Program was,
 24 to my knowledge, the first time the USDA informed employees about any upcoming "Reductions
 25 in Force" or RIFs. We had heard of the threat of RIFs through the President's Executive Order and
 26 the press coverage, but no information came from the USDA until this time.

27 11. Although the USDA has not made public or informed the Union of the content of
 28 the ARRP, or sent notices of any RIF, public press reports state that massive workforce reductions

1 at the USDA's Washington D.C. headquarters are forthcoming, along with consolidations of
2 "mission areas" and relocations of staff across the country. One report, from Government
3 Executive, on April 15, states that the Trump administration is planning to "slash[] workers" and
4 "gut" the USDA Washington, D.C. headquarters. A true and correct copy of that report, which is
5 also available at <https://www.govexec.com/management/2025/04/white-house-pitches-layoffs-local-office-closures-and-program-eliminations-usda/404580/>, is attached hereto as Exhibit A.
6 Another report, from Fox 5 DC on April 8, states that the USDA plans to "dismantle" its
7 headquarters and layoff thousands of workers. A true and correct copy of that report, which is also
8 available at <https://www.fox5dc.com/news/usda-close-down-dc-headquarters-lay-off-thousands-workers-report>, is attached hereto as Exhibit B.

11 12. On January 28, 2025, the Union sent Information Requests to USDA management
12 regarding the potential termination of probationary employees, the Schedule Policy/Career
13 excepted service changes, and the return to office plans. A true and correct copy of the January 28
14 communications are attached hereto as Exhibit C. On March 19, 2025, the Union sent an
15 Information Request to USDA management requesting any documents or plans for USDA
16 reorganization or RIFs. A true and correct copy of that March 19 communication is attached
17 hereto as Exhibit D.

18 13. To date, the Union has received no response to either of these requests and has not
19 otherwise received any information about the RIF/Reorganization Plan.

20 14. If the press reports are true and the USDA will make dramatic staffing cuts to the
21 D.C. Headquarters workforce, the FAS will not be able to operate effectively. Most employees at
22 the FAS have a specific subject matter expertise. If any number of these valuable employees
23 receive a RIF notice and are laid off, there would be a serious loss of institutional and global
24 market knowledge. As a result, there is a high possibility that information about market conditions
25 and U.S. agricultural exports relayed to the public and policy makers would be inaccurate or
26 incomplete, to the grave detriment of American consumers and American agricultural producers.

27 15. For example, FAS employs a subject matter expert—one of the only in the United
28 States—on mad cow disease and the beef trade. She is leaving the USDA as part of the DRP.

1 Without her expertise, the FAS will have difficulty understanding how products may be impacted
 2 due to mad cow disease infections or establishing reasonable trade barriers to avoid disease
 3 entering the population without unnecessarily harming the beef industry. I work with many other
 4 specialized individuals like this, who, if laid off through a RIF, would leave a significant gap in
 5 FAS's knowledge on certain subjects critical to international agricultural trade. With a government
 6 wide hiring freeze, they cannot be replaced.

7 16. RIF notices in other parts of the USDA would also be extremely harmful to the
 8 FAS. FAS economists collaborate frequently with other USDA economists and work together to
 9 create monthly market supply and demand circulars that U.S. producers rely on. If many of these
 10 economists are laid off in a RIF, the FAS will have a difficult time creating these circulars
 11 accurately and on time each month, if they are able to at all. Without these circulars, U.S.
 12 producers, commodity buyers, and traders will lack the necessary information they expect to
 13 receive from FAS. For example, every month FAS publishes the World Agricultural Supply and
 14 Demand Estimates ("WASDE"). The monthly report provides annual forecasts for supply and
 15 demand of agricultural goods, such as wheat, rice, coarse grains, oilseeds, and cotton. Farmers
 16 rely on this information to determine how much acreage of a certain commodity they should plant,
 17 based on the projected market conditions. Commodity traders also use this data in contracts and
 18 futures. If the report contains inaccurate data, millions of dollars could be lost.

19 17. Additionally, if the press reports come to fruition soon and the USDA sends RIF
 20 notices to thousands of employees, the impact on the workers who remain at the FAS will be
 21 unbearable. The workloads of remaining employees will increase dramatically, and they will be
 22 forced to work in areas, either geographically or by commodity, they lack expertise or experience
 23 in, making it even more challenging to keep up with the unrealistic workload.

24 18. Another of FAS's functions is providing reimbursements to American exporters.
 25 Currently, only two employees perform these functions. If RIFs affect either, or both, of them,
 26 FAS will not be able to effectively process applications. Responses to reimbursement applications
 27 will be delayed, and responses will be rushed and of lower quality. I would expect, if any of these
 28

1 employees receive RIF notices or move to other roles, there will be a higher chance of mistakes,
 2 errors, omissions, and late payments to U.S. commodity associations.

3 19. The FAS is one of the few offices in the federal government working on issues
 4 relating to the recent tariffs, as the quickly changing tariffs have significant impacts for the U.S.
 5 agricultural sector. For example, when China halted soybean imports from American producers,
 6 the FAS is responsible for finding new markets for soybeans to support American farmers. That
 7 work must occur quickly, so that market prices remain steady and farmers do not have to pay to
 8 store their crops while they wait for better market conditions. Our work is more important now
 9 than ever.

10 20. Finally, RIF notices at the FAS will have an impact on rural communities across
 11 the country. The United States produces more food than we consume, and the FAS works to assist
 12 in exports of this surplus food. For example, half of the wheat grown in the U.S. is exported
 13 annually. Creating access to new markets supports rural economies by supporting new and
 14 continuing trade. Ensuring there are markets for what farmers grow in the United States is
 15 important to small communities in every state.

16 21. The planned reorganization and RIFs directly threaten the Union's ability to
 17 provide core services to unit members and to accomplish its mission. Since January 2025, the
 18 Union has been inundated with communications from employees who are very concerned about
 19 their livelihoods and how the USDA will effectuate its mission after such drastic personnel cuts.
 20 Bargaining unit employees have contacted the Union to seek information, guidance, explanations
 21 of their rights, and legal advice. Many bargaining unit members are desperately trying to
 22 determine whether they should take one of the resignation plans or wait for a RIF notice and
 23 how they will pay for basic needs such as health insurance, housing, and childcare. My time, as
 24 local president, has been consumed by answering worried employees' questions, managing town
 25 halls, and preparing information to release to the bargaining unit about our rights.

26 22. While I have provided here information specific to FAS because I am most familiar
 27 with its operations from my work and union leadership, I also am familiar with other agencies
 28 under USDA—both because I work there and because I communicate with local union presidents

representing employees in those divisions—and the same types of major disruption to the other agencies' operations would be caused there by large-scale RIFs as well.

3 23. I worked at the USDA in 1996 during a RIF in a sister USDA agency. The current
4 RIFs and reorganizations being dangled over our heads as a threat are nothing like the RIF I
5 witnessed in 1996, which took well over a year. In 1996, USDA repeatedly consulted with
6 Congress to ensure the USDA did not cut critical services, and employees received ample notice
7 of potential RIFs. This has not been the case this year.

8 24. The Union's staff and activities are funded through members' voluntary dues, most
9 of which are paid through payroll deduction. If the Union no longer receives dues from a large
10 portion of our 400 members who are laid off, that will make it significantly more difficult for the
11 Union to continue to function and to provide the services and protection to the bargaining unit
12 identified here.

I declare under penalty of perjury under the laws of the United States that the foregoing is
true and correct. Executed April 25, 2025, in Arlington, VA.

Leiana Coetano Sochero

Liliana Caetano Bachelder

Exhibit A

Government Executive

White House pitches layoffs, local office closures and program eliminations at USDA

By Eric Katz

April 15, 2025

The Trump administration is planning to severely scale back or outright eliminate funding for many programs across the Agriculture Department, according to White House documents obtained by *Government Executive*, as it slashes workers and closes offices at the local level.

The “passback” document from the Office of Management and Budget proposing fiscal 2026 funding levels would gut research and conservation efforts, trim program budgets nearly across the board and cut staff as part of what OMB called “many difficult decisions” that “were necessary” to reach the proposed spending level. The document assumes savings from [upcoming layoffs](#) at USDA, including those at the Farm Services Agency and Natural Resources Conservation Service, and calls for “protecting the American people by deconstructing a wasteful and weaponized bureaucracy.”

The proposed cuts come as USDA is planning to gut its Washington headquarters, consolidate mission areas and administrative functions and relocate some staff to new “hubs” around the country. Thousands of employees are expected to receive reduction-in-force notices, though the impact of those cuts could be mitigated by [the 16,000 employees](#) who have already accepted the department’s “deferred resignation” offers.

The passback document, which is considered “predecisional” and subject to change, assumes the cost savings associated with USDA’s RIF and reorganization plan. Passbacks serve as OMB’s response to agencies’ individual budget submissions. The Congressional Research Service [has noted](#) agencies can appeal certain programmatic decisions to OMB, but the documents generally serve as the White House office’s final decision.

In the document, OMB directed USDA to develop plans to consolidate its local, county-based offices around the country into state committees that would service the FSA, NRCS and Rural Development. Those three agencies employ nearly 20,000 workers and one official who helps oversee them said the change would lead to office closures at the county level.

“That would be laying off those county employees that USDA has,” that official said. “Ironically, these are the people that are directly where the farmers are.”

USDA Secretary Brooke Rollins last month called those agencies, along with the Risk Management Agency, “the most farmer-facing mission area at USDA,” which “producers rely on every day.”

OMB suggested the Farm Production and Conservation Business Center, which provides management and shared services to FSA, NRCS and RMA, will have less work to do going forward “given the reduction of staffing proposed” for those agencies. FSA would see its salaries and expense account cut by 22% under the OMB suggestion as the agency modernizes the customer experience and implements “a smaller footprint of FSA county offices.”

Zachary Ducheneaux, who served as FSA administrator for four years until January, likened the Trump administration’s approach to a beef cattle producer starving his cows to boost efficiency and then getting rid of them when those results,

predictably, do not occur. The plan, given FSA's scope of work assisting farmers across the country, is "really short-sighted at best."

"In all of my travels in the last four years, I have never heard any single producer say, 'We have too many damn staff in [USDA] offices and we hate them,'" Ducheneaux said.

He predicted farmers who do not have private sector options will wait longer to get federal loans and federal personnel will miss deadlines set in statute and regulation because "there is not enough time in the day." That will fail to satisfy congressional Republicans, he added, who criticized the Biden administration for taking too long to provide key services to their constituents.

Among the other cuts the Trump administration is looking to implement at USDA would be eliminating forest and rangeland research as currently conducted by the U.S. Forest Service. *Government Executive* previously reported USDA planned to slash research at USFS and eliminate research stations as part of its RIF and reorganization plan. It would also eliminate a program that provides state, private and tribal landholders with funding to help prevent and fight wildfires. NRCS would slash funding for its Private Lands Conservation Operations by \$773 million, though OMB said some of those cuts would be offset elsewhere in the budget.

Sen. Patty Murray, D-Wash., the top Democrat on the Senate Appropriations Committee, said the cuts OMB has proposed represented a "one-two punch" when coupled with the impact of President Trump's tariffs and ensuing trade war. She added the proposed cuts and program eliminations included in the passback would "pull the rug out on our farmers and rural communities."

"There's nothing efficient or smart about gutting our investments in American agriculture and our public lands," Murray said. "This proposal is a roadmap for retreat that would leave our country worse off."

Two programs that provide American-grown commodities to feed vulnerable populations abroad—McGovern-Dole and Food for Peace grants, which are collectively allocating nearly \$2 billion annually—would see their funding eliminated. Discretionary spending on Rural Utility Service programs that provide advanced telecommunications technology to enhance learning and health care opportunities for rural residents and funding for reliable drinking water systems, sanitary sewage disposal and storm water drainage in rural areas would be decimated.

Asked about the cuts, Alexandra McCandless, an OMB spokesperson, said only that "no final funding decisions have been made." A USDA spokesperson said that while the department was "actively pursuing plans" to reduce the workforce, it would ensure key services would not be impacted.

"We have a solemn responsibility to be good stewards of Americans' hard-earned taxpayer dollars and to ensure that every dollar is being spent as effectively as possible to serve the people, the spokesperson said.

Overall, the Trump administration said it would create a "renewed emphasis on federalism" within the department by establishing a "proper balance" between state and federal responsibilities. USDA will also realize savings by offloading facilities and launching other government efficiency initiatives, OMB said.

Congress will ultimately have the authority to set appropriations for all agencies across government.

Ducheneaux said the human impact on laid off USDA staff in rural communities will be "generational."

"There are so many lifelong, dedicated career civil servants who are working there, who could be making more out in the private sector, but are choosing to be there for their neighbors and their community," he said.

By Eric Katz

April 15, 2025

<https://www.govexec.com/management/2025/04/white-house-pitches-layoffs-local-office-closures-and-program-eliminations-usda/404580/>

Exhibit B

[Watch Live](#)

USDA to close down DC headquarters, lay off thousands of workers: report

By Homa Bash | Updated April 8, 2025 7:43pm EDT | News | FOX 5 DC |

USDA to close DC office, lay off thousands of workers: report

There are new reports that the U.S. Department of Agriculture plans to dismantle its headquarters in D.C. and lay off thousands more workers.

The Brief

- A new report indicates that the USDA is planning to shut down its D.C. headquarters and lay off thousands of workers.
 - According to the report, the plan is to relocate employees who are not laid off to three hubs across the country.
 - Dozens of leases at field offices are also on the chopping block.
-

WASHINGTON - There are new reports that the U.S. Department of Agriculture plans to dismantle its headquarters in D.C. and lay off thousands more workers.

What we know: Eric Katz is the journalist who broke the story in the publication Government Executive, reporting that the USDA plans to offload one of its two main buildings at the headquarters in D.C. and terminate thousands more positions.

"We think it'll be pretty soon," Katz explained. "Employees have incentives that are voluntary to leave the department and at the end of that - wrapping up next week and next - we expect mandatory layoffs will take place quickly after that."

Katz' reporting also found that the plan is to relocate employees who are not laid off to three hubs across the country, though it's not clear yet exactly where those will be.

Dozens of leases at field offices are also on the chopping block.

"The justification is to have the Department of Agriculture be closer to the farmers and ranchers but that's just rhetoric. Because the reality is that it's probably better to be centralized near other agencies than, I don't know where they have in mind, Omaha, Nebraska, Wichita, Kansas," said David Katz, an attorney and policy analyst.

What they're saying: John Boyd is the president and founder of the National Black Farmers Association, representing about 150,000 farmers across the United States.

He's been a fourth-generation farmer in Virginia for 42 years and said he has never seen anything like this before.

"A lot of these farmers are scared. They don't know what's going to happen," Boyd said.

And the worst part about it, he said, is the timing. Right now is planting season, Boyd adding that this is when farmers need the most clarity about their path ahead.

"This administration put a halt on loans, grants and things to help farmers but I [President Trump] keeps making these announcements — almost in a sly, sarcastic way — that he loves farmers and we're just going to have to ride this out," Boyd said.

What we don't know: D.C. Mayor Muriel Bowser's office told FOX 5 they have no comment on the potential move.

In February, the USDA terminated about 6,000 jobs. A month later, those jobs were ordered to be reinstated by a federal judge. But it's not clear if those positions will be impacted by the Supreme Court's latest ruling on probationary federal workers.

New Statement: A USDA spokesperson provided FOX 5 with a statement Tuesday afternoon, saying:

"Under President Trump's leadership, USDA is being transparent about plans to optimize and reduce our workforce and to return the Department to a customer service focused, farmer first agency. We have a solemn responsibility to be good stewards of Americans' hard-earned taxpayer dollars and to ensure that every dollar is being spent as effectively as possible to serve the people. Secretary Rollins is actively pursuing plans to reduce USDA's workforce to better serve the needs of the people we serve."

News Washington, D.C.

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Exhibit C

Information Request

Date: 1/28/25

Requester: AFSCME Local 3976

Information Requested:

Pursuant to 5 U.S.C. 7114, we request a copy of the report to OPM that lists bargaining unit employees the agency identified as on probationary periods, who have served in less than a year in a competitive service appointment, or who have served less than two years in an excepted service appointment, pursuant to the January 20, 2025 Guidance on Probationary Periods, Administrative Leave and Details sent to heads and acting heads of departments and agencies from Charles Ezell, Acting Director of the Office of Personnel Management. we also request copies of all documents, emails, memos, reports or communications related to the agency's determination whether those employees should be retained at the agency.

Particularized Need:

Our particularized need for this information is that we are the exclusive representative of employees who may be listed or referenced in these documents. In our capacity as exclusive representative, we intend to utilize all available mechanisms to protect the claims of employees who assert they were listed erroneously and/or who want to challenge the agency's calculation of their probationary period. We will also use the data to assess the potential impact of the implementation of the January 20, 2025 memo and exercise our rights under the statute as exclusive representative as it relates to this initiative. We need this information to fully perform our representational function and fulfill our duty of fair representation.

Timeline:

Given this information is readily accessible, we request that it be provided to the union no later than 1/30/25

Information Request

Date: 1/28/25

Requester: AFSCME Local 3976

Information Requested:

Pursuant to 5 U.S.C. 7114, we request a copy of the return to office plans submitted to OPM pursuant to the January 27, 2025 "Agency Return to Office Implementation Plans" sent to heads and acting heads of departments and agencies from Charles Ezell, Acting Director of the Office of Personnel Management.

Particularized Need:

Our particularized need for this information is to ensure agency compliance with Article 14 of the Collective Bargaining Agreement and any other bargaining obligations. This information will be used to determine whether it is appropriate to file a grievance, ULP, or engage in I&I bargaining. We need this information to fully perform our representational function and fulfill our duty of fair representation.

Timeline:

We request that this information be sent to the union no later than February 7, 2025

Information Request

Date: 1/28/25

Requester: AFSCME Local 3976

Information Requested:

Pursuant to 5 U.S.C. 7114, we request a copy of the report to OPM that lists the positions that the agency is petitioning to convert to the new Schedule Policy/Career excepted service pursuant to the January 27, 2025 “Guidance on Implementing President Trump’s Executive Order titled, ‘Restoring Accountability to Policy-Influencing Positions Within the Federal Workforce’” sent to heads and acting heads of departments and agencies from Charles Ezell, Acting Director of the Office of Personnel Management. We also request copies of all documents, emails, memos, reports and communications related to the agency’s determination that these positions are appropriate for conversion to Schedule Policy/Career.

Particularized Need:

Our particularized need for this information is that we are the exclusive representative of employees who may be listed or referenced in these documents. In our capacity as exclusive representative, we intend to utilize all available mechanisms to protect the claims of employees who assert their positions were listed erroneously and/or who want to challenge the agency’s determination. We will also use the data to assess the potential impact of the implementation of the January 27, 2025 memo and exercise our rights under the statute as exclusive representative as it relates to this initiative. We need this information to fully perform our representational function and fulfill our duty of fair representation.

Timeline:

We request that preliminary petition to OPM and accompanying information be submitted by 4/20/25. We also request that the final petition and accompanying information be sent to the union on 5/20/25.

Exhibit D

Liliana Bachelder
President, AFSCME Local 3976

March 19, 2025

Bryce Onnen
Labor Relations

Subject: AFSCME Local 3976 Request for Information Regarding Executive Order 14210

Please accept this letter as a formal request for information (RFI) on behalf of the American Federation of State, County and Municipal Employees (AFSCME), Local 3976. AFSCME Local 3976 is requesting this information regarding the Foreign Agricultural Service's mandated compliance with Executive Order 14210: *Implementing the President's 'Department of Government Efficiency' Workforce Optimization Initiative.*

Pursuant to 5 U.S.C. §7114(b)(4) of the Federal Service Labor-Management Relations Statute, which mandates federal agencies to furnish labor unions with information necessary to effectively fulfill its representational duties, and the applicable provisions of the collective bargaining agreement, AFSCME Local 3976 requests the following information:

1. Any documents or plans for reorganization or reduction in force (RIF) created or submitted to the United States Office of Management and Budget (OMB) to comply with Executive Order 14210.
2. Any additional relevant details or documents regarding the impact of such a reduction in force on bargaining unit members.

The requested information is also essential for AFSCME Local 3976 to fulfill its obligation to ensure proper contract administration and evaluate potential grievances that may be filed under Article 22 of the CBA which governs reductions in force. AFSCME Local 3976 is also requesting this information in anticipation of impact and implementation bargaining under Article 36 of the CBA and applicable law.

We respectfully request a response within seven (7) calendar days from the date of this letter. Thank you for your attention and cooperation. Should you have any questions or need further clarification, please do not hesitate to contact me at [contact].

Sincerely,

Liliana Bachelder
President, AFSCME Local 3976